

Kevin T. Mulhearn, P.C.
60 Dutch Hill Road, Suite 6B
Orangeburg, New York 10962
(845) 613-7059
kmulhearn@ktmlaw.net

VIA ECF

November 14, 2022

Hon. P. Kevin Castel
United States District Judge
U.S. District Court, Southern District of New York
500 Pearl Street, Courtroom 110
New York, New York 10007

Approved -
SO ORDERED
J. Mulhearn, USDO
11-15-22

Re: *Jane Doe v. Yeshiva University, et al.*
Case No. 1:22-cv-05405-PKC: Request to File Omnibus Memorandum of Law in
Opposition to Defendants' Two Motions to Dismiss the Amended Complaint

Dear Judge Castel:

I write to request the Court's permission to file one Omnibus Memorandum of Law in opposition to the Defendants' two motions to dismiss the Amended Complaint.

On October 17, 2022, the Yeshiva University Defendants (Yeshiva University, Andrew Lauer, Esq., and Chaim Nissel) filed a motion to dismiss the Amended Complaint with a 22-page Memorandum of Law in Support of that motion. (Doc. No. 43). On October 17, 2022, the Seyfarth Defendants (Seyfarth Shaw, LLP, Dov Kesselman, Esq., and Emily Miller, Esq.) also filed a separate motion to dismiss the Amended Complaint with a 24-page Memorandum of Law in support of that motion. (Doc. No. 40).

Plaintiff's opposition papers in response to both motions are due on November 17, 2022.

As there is some overlap of both the facts and the implicated legal issues, I believe that it will be more convenient and efficient for the Court and the parties for Plaintiff to respond with but one omnibus memorandum of law in opposition. (This memorandum will be no more than 45-pages.)

I have obtained consent of counsel for the Yeshiva Defendants and the Seyfarth Defendants to file an Omnibus Memorandum of Law in Opposition that will be no longer than 45-pages. If this is acceptable to Your Honor, kindly endorse this letter request at the Court's earliest convenience.

Thank you for your consideration.

Very best regards,
Kevin T. Mulhearn /s/
KEVIN THOMAS MULHEARN
KTM/gl